

## **EXHIBIT 2**

**TAFT, STETTINIUS & HOLLISTER LLP**

425 WALNUT STREET, SUITE 1800

CINCINNATI, OHIO 45202-3957

513-381-2838

FAX: 513-381-0205

www.taftlaw.com

COLUMBUS, OHIO OFFICE  
TWELFTH FLOOR  
21 EAST STATE STREET  
COLUMBUS, OHIO 43215-4221  
614-221-2838  
FAX: 614-231-2007

NORTHERN KENTUCKY OFFICE  
SUITE 340  
1717 DIXIE HIGHWAY  
COVINGTON, KENTUCKY 41011-4704  
859-331-2838  
513-381-2838  
FAX: 513-381-6513

CLEVELAND, OHIO OFFICE  
3500 BP TOWER  
200 PUBLIC SQUARE  
CLEVELAND, OHIO 44114-2302  
216-241-2838  
FAX: 216-241-3707

**GREGORY PARKER ROGERS**

(513) 357-9349

rogers@taftlaw.com

February 3, 2003

David Sanford  
Gordon, Silberman, Wiggins & Childs, P.C.  
7 DuPont Circle, N.W.  
Suite 200  
Washington, D.C. 20036

Re: Bert et al. v. AK Steel Corporation

Dear Mr. Sanford:

Enclosed please find Defendant AK Steel Corporation's Initial Disclosures with reference to the above matter.

Sincerely,



Gregory Parker Rogers

GPR/clh

Encl.

CC: Grant Morris (w/encl.)  
Paul Tobias (w/encl.)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

VIVIAN BERT, ET AL.,

Plaintiff,

v.

AK STEEL CORPORATION,

Defendant.

Case No. C-1-02-467

Judge Beckwith

DEFENDANT AK STEEL  
CORPORATION'S  
INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Defendant AK Steel Corporation ("AK Steel") provides the following initial disclosures to Plaintiffs:

(1) The individuals listed below are likely to have discoverable information that AK Steel may use to support its defenses. The subjects of information listed are not all inclusive; each individual may have knowledge of a subject other than those listed below.

<u>Name</u>	<u>Subject Matter</u>
Vivian Bert	All matters relating to the pleadings
Darlene Denise Carter	All matters relating to the pleadings
Darrell Carter	All matters relating to the pleadings
Marnie Carter	All matters relating to the pleadings
<del>Louis Cox</del>	AK Steel's outreach to minorities
Donald Edwards	All matters relating to the pleadings
Thaddeus Freeman	All matters relating to the pleadings
Lucy Gibson	Validation of AK Steel's test
Resource Associates Inc. 1140 Topside Road, Suite 3 Louisville, Tennessee 37777	

~~Brenda Harmon~~

AK Steel Corporation  
1801 Crawford Street  
Middletown, Ohio 45047

Mary Harris

Jessica Hicks  
AK Steel Corporation  
1801 Crawford Street  
Middletown, Ohio 45043

Kay Jackson

Tiffany Jackson

~~Michael Lehman~~

AK Steel Corporation  
1801 Crawford Street  
Middletown, Ohio 45043

Susan Lester  
AK Steel Corporation  
P.O. Box 191  
Ashland, Kentucky 41105

Dwight Lewis

Edward James Lewis

Michael Miller

Timothy Oliphant

Shawn Pryor

Roderique Russell

Phyllis Short  
AK Steel Corporation  
1801 Crawford Street  
Middletown, Ohio 45043

Ronald Sloan

AK Steel's policies, practices and hiring decisions

All matters relating to the pleadings

AK Steel's policies, practices and hiring decisions at Middletown

All matters relating to the pleadings

All matters relating to the pleadings

AK Steel's policies, practices and hiring decisions at Middletown

AK Steel's policies, practices and hiring decisions at Ashland

All matters relating to the pleadings

All matters relating to the pleadings

All matters relating to the pleadings

All matters relating to the pleadings

All matters relating to the pleadings

All matters relating to the pleadings

AK Steel's policies, practices and hiring decisions at Middletown


All matters relating to the pleadings

Defendant reserves the right to supplement or amend the foregoing.

(2) AK Steel will produce at a mutually agreeable time and place documents consistent with its obligations under Fed. R. Civ. P. 26(a)(1)(B).

- (3) AK Steel has an insurance agreement that is applicable to this matter.

Respectfully submitted,

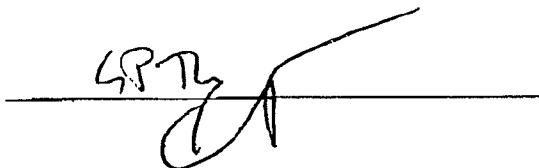
  
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Lawrence V. Barty (0016002)  
Gregory Parker Rogers (0042323)  
Patricia Anderson Pryor (0069545)  
Roger A. Weber (0001257)  
Taft, Stettinius & Hollister LLP  
425 Walnut Street, Suite 1800  
Cincinnati, Ohio 45202-3957  
(513) 381-2838  
(513) 381-0205 (fax)  
Trial Attorneys for Defendant  
AK Steel Corporation

OF COUNSEL:

John P. O'Connor  
AK Steel Corporation  
703 Curtis Street  
Middletown, Ohio 45043-0001  
(513) 425-5000

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was this 3 day of <sup>February</sup> ~~January~~, 2003 mailed to David Sanford, Eric Bachman, Charles Dixon, Gordon, Silberman, Wiggins & Childs, P.C., 7 DuPont Circle, N.W., Suite 200, Washington, D.C. 20036, Grant Morris, 7 DuPont Circle, N.W., Suite 250, Washington, D.C. 20036, Paul Tobias and Davis Krammer, Tobias Kraus & Torchia LLP, 414 Walnut Street, Suite 911, Cincinnati, Ohio 45202.



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